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*Attorneys for Pixxles LTD*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

IBUUMERANG, LLC, a Texas limited liability  
company,

Plaintiff,

vs.

T1 PAYMENTS LLC, a Nevada limited  
liability company; T1 PAYMENTS  
LIMITED, a United Kingdom private limited  
company; TGLOBAL SERVICES LIMITED,  
a United Kingdom private limited company;  
DONALD KASDON, an individual; DEBRA  
KAREN KING aka DEBRA KAREN  
KASDON, an individual; AMBER  
FAIRCHILD, an individual; PAYVISION  
B.V., a Netherlands limited company; and  
PIXXLES, Ltd., a United Kingdom private  
limited company

Defendants.

CASE NO. 2:21-cv-01611-JCM-VCF

**UNOPPOSED/CONSENT MOTION  
REGARDING PIXXLES LTD.'S  
DEADLINE TO ANSWER OR  
OTHERWISE RESPOND TO  
IBUUMERANG, LLC'S FIRST  
AMENDED COMPLAINT [ECF No. 9]**

**[Special Appearance Only]**

1 Having obtained plaintiff Ibuumerang, LLC's consent, specially-appearing defendant  
 2 Pixxles Ltd.<sup>1</sup> brings this motion to extend its time to answer or otherwise respond to the First  
 3 Amended Complaint (ECF No. 9, "FAC").

4 Ibuumerang filed its FAC on September 17, 2021, naming Pixxles as a defendant. Pixxles  
 5 is organized and exists under the laws of the United Kingdom. Pixxles received the lawsuit on  
 6 December 10, 2021.

7 Good cause exists to allow Pixxles to file its response to the FAC on or before  
 8 January 21, 2022, due to the intervening holidays and the schedules of counsel. Pixxles has not  
 9 requested prior extensions; this request is not made for purposes of undue delay; and there are no  
 10 pretrial or trial deadlines. Additionally, Ibuumerang consents to the requested extension.

11 THEREFORE, Pixxles Ltd. requests that this Court allow it to respond to the FAC on or  
 12 before January 21, 2022.

13 DATED: December 16, 2021

By: /s/ Kory L. Kaplan

**KAPLAN COTTNER**

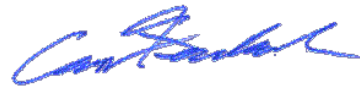
Kory L. Kaplan, Esq.

**VENABLE LLP**

Ari N. Rothman, Esq.

*Counsel for Pixxles Ltd.*

14 IT IS SO ORDERED.

15 

16 Cam Ferenbach

17 United States Magistrate Judge

18 DATED 12-16-2021

19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27 <sup>1</sup> Pixxles Ltd. files this motion through a special appearance because it contests that Nevada courts  
 28 may exercise personal jurisdiction over it. Thus, by filing this motion, Pixxles does not consent  
 to the personal jurisdiction of the Court or waive any defenses. Pixxles will move to dismiss  
 for lack of personal jurisdiction and any other available grounds under Rule 12.